

1 RODNEY M. HUDSON (State Bar No. 189363)  
2 DRINKER BIDDLE & REATH LLP  
3 50 Fremont Street, 20th Floor  
4 San Francisco, California 94105-2235  
5 Telephone: (415) 591-7500  
6 Facsimile: (415) 591-7510

7 Attorneys for Defendants  
8 BAYER HEALTHCARE PHARMACEUTICALS INC.  
9 and BAYER HEALTHCARE LLC  
10

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 ORELLENE SEABOLD,  
15 Plaintiff,

16 v.

17 BAYER HEALTHCARE  
18 PHARMACEUTICALS, INC.; BAYER  
19 HEALTHCARE LLC; GENERAL  
20 ELECTRIC COMPANY; GE  
21 HEALTHCARE, INC.; COVIDIEN, INC.;  
22 MALLINCKRODT, INC.; and BRACCO  
23 DIAGNOSTICS, INC.,

24 Defendants.

Case No. CV-08-1367 EMC

**CORPORATE DISCLOSURE  
STATEMENT OF BAYER  
HEALTHCARE PHARMACEUTICALS  
INC. AND BAYER HEALTHCARE  
LLC**

**(Pending Transfer to: In re: Gadolinium  
Contrast Dyes Products Liability  
Litigation, MDL No. 1909, N.D. Ohio)**

**[F.R.C.P. 7.1]**

25 Pursuant to Federal Rule of Civil Procedure 7.1(a), Defendants Bayer HealthCare  
26 Pharmaceuticals Inc. and Bayer HealthCare LLC make this their Corporate Disclosure  
27 Statement. Defendants Bayer HealthCare Pharmaceuticals Inc. and Bayer HealthCare  
28 LLC state that they are nongovernmental corporations.

Defendant Bayer HealthCare Pharmaceuticals Inc. is wholly owned by Schering  
Berlin, Inc. Schering Berlin, Inc. is wholly owned by Defendant Bayer HealthCare LLC.  
Defendant Bayer HealthCare LLC is wholly owned by Bayer Corporation. Bayer  
Corporation is wholly owned by Bayer AG. Bayer AG is publicly traded in Germany and

1 its American Depositary shares are listed on the New York Stock Exchange.

2 No other publicly held company owns ten percent (10%) or more of the stock of  
3 Defendants Bayer HealthCare Pharmaceuticals Inc. or Bayer HealthCare LLC.

4  
5 Dated: March 31, 2008

DRINKER BIDDLE & REATH LLP

6 /S/ Rodney M. Hudson  
7 \_\_\_\_\_  
8 RODNEY M. HUDSON

9 Attorneys for Defendants  
10 BAYER HEALTHCARE  
11 PHARMACEUTICALS INC. and BAYER  
12 HEALTHCARE LLC  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28